

October 24, 2022

**VIA ECF**

The Honorable Victor Marrero  
United States District Judge  
United States District Court for the Southern District of New York  
500 Pearl Street, Suite 1040  
New York, New York 10007

**Re: Ramchandani v. Citigroup, Inc., et al., 19-cv-09124 (VM)**

Dear Judge Marrero:

The parties write jointly on behalf of Plaintiff Rohan Ramchandani ("Plaintiff") and Defendants Citigroup Inc., Citicorp LLC and Citibank, N.A. (collectively "Defendants"), pursuant to Your Honor's Order dated October 18, 2022 directing the parties to submit a proposed briefing schedule for Defendants' motion for summary judgment. The parties met and conferred and have agreed upon the following proposed briefing schedule for Your Honor's consideration:

- Defendants' Motion and opening papers due: December 9, 2022
- Plaintiff's opposition due: February 1, 2023
- Defendants' reply due: February 22, 2023

Respectfully submitted,

**LAW OFFICE OF DAVID R. LURIE, PLLC**

By: /s/ David R. Lurie  
David R. Lurie  
194 President Street  
Brooklyn, New York 11231  
Telephone: (347) 651-0194  
[david@davidlurielaw.com](mailto:david@davidlurielaw.com)

**GARY GREENBERG, ESQ.**

By: /s/ Gary Greenberg  
Gary Greenberg, Esq.  
99 Hudson Street, 5th Floor  
New York, NY 10013  
(212) 765-5770  
[gg@ggreenberglaw.com](mailto:gg@ggreenberglaw.com)

*Counsel for Plaintiff*

**GOODWIN PROCTER LLP**

By: /s/ Marshall H. Fishman  
Marshall H. Fishman  
Samuel J. Rubin  
William J. Harrington  
Lindsay E. Hoyle  
The New York Times Building  
620 Eighth Avenue  
New York, NY 10018  
Telephone: (212) 813-8800  
Facsimile: (212) 355-3333  
[mfishman@goodwinlaw.com](mailto:mfishman@goodwinlaw.com)  
[srubin@goodwinlaw.com](mailto:srubin@goodwinlaw.com)  
[wharrington@goodwinlaw.com](mailto:wharrington@goodwinlaw.com)  
[lhoyle@goodwinlaw.com](mailto:lhoyle@goodwinlaw.com)

*Counsel for Defendants*

cc: All counsel of record (via e-mail)